



721 Route 202-206  
Suite 200  
P.O. Box 5933  
Bridgewater, NJ 08807  
T: 908-722-0700  
F: 908-722-0755

November 2, 2015

**BY ECF AND FEDERAL EXPRESS**

The Hon. Michael A. Hammer  
United States Magistrate Judge  
Martin Luther King, Jr. Federal Building  
Courtroom MLK 3C  
50 Walnut Street  
Newark, New Jersey 07101

Re: *Mylan Pharmaceuticals, Inc. v. Celgene Corp.*, Civ. No. 14-2094 (ES)(MAH)

Dear Judge Hammer:

This letter is submitted on behalf of defendant Celgene Corporation in response to the Motion to Seal filed by plaintiff Mylan Pharmaceuticals, Inc., [Dkt. No. 132-2]. Mylan's motion pertains entirely to confidential documents and information belonging to Celgene, which Mylan referenced in or attached to its opposition supplemental letter brief [Dkt. No. 131, Dkt. No. 131-2, Dkt. No. 131-3]. Celgene affirms that the information at issue in Mylan's motion is Celgene's private, proprietary business information, the public disclosure of which may pose a substantial risk of harm to Celgene's legitimate business interests and competitive position. Celgene has set out in its own motion to seal (which addresses the same opposition supplemental letter brief, together with other confidential items) the factual background and its legal argument with respect to these materials, *see* [Dkt. No. 120], and as to the instant motion, agrees with Mylan that the standard for sealing under Local Civil Rule 5.3 has been satisfied. For such reason, and for the reasons explained in Mylan's moving brief [Dkt. No. 132], Celgene respectfully joins in Mylan's request that the materials addressed in Mylan's motion be sealed.<sup>1</sup>

Respectfully submitted,

**NORRIS, McLAUGHLIN & MARCUS**

/s/ Daniel R. Guadalupe

Daniel R. Guadalupe

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<sup>1</sup> Because Celgene's motion to seal, [Dkt. No. 120], addresses a broader set of documents and information than encompassed by this motion, Celgene does not intend this response to be construed as a withdrawal of its own motion, and respectfully submits that both motions should be granted.



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cc: (via ECF and courtesy email):

Arnold B. Calmann, Esq.

Jakob B. Halpern, Esq.

Seth Silber, Esq.

Counsel of Record